

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION**

RAVGEN, INC.,

Plaintiff,

v.

NATERA, INC. AND NSTX, INC.,

Defendants.

Civil Action No. 1:20-cv-00692-ADA

JURY TRIAL DEMANDED

JOINT PENDING MOTIONS REPORT

Pursuant to the Court's request, Plaintiff, Ravgen, Inc. ("Ravgen") and Defendants Natera, Inc. and NSTX, Inc. (collectively "Natera") respectfully submit this Joint Pending Motions Report.

On March 22, 2023, the parties filed a joint status report (D.I. 281), in which the parties each proposed that supplementation to the existing record is required, and proposed competing schedules for supplementing the record in this case in preparation for trial. Based on the passage of time and additional events that have occurred since the parties completed dispositive motion briefing and pretrial exchanges in this case in November 2021, the parties agreed in that joint status report to withdraw all remaining pending motions, subject to their ability to file a significantly more limited number of such motions after supplementing the record according to the schedule adopted by the Court.

After the submission of the March 22, 2023 joint status report, Natera filed a Motion for Leave to Amend Their Answer and Defenses (D.I. 286), which Ravgen opposes (D.I. 292). That motion has now been fully briefed and is currently pending before this Court.

Natera respectfully requests a status conference in order to address the scheduling and supplementation issues in the joint status report and Natera's Motion for Leave to Amend. Ravgen believes the Court can resolve both supplementation issues and Natera's Motion for Leave to Amend on the papers that have been submitted. Thus, Ravgen does not believe a conference is necessary but will proceed as the Court sees fit.

Dated: May 15, 2023

/s/ Amanda L. Major

Stephen M. Hash (Texas Bar No. 24012800)
Samoneh Schickel (Texas Bar No. 24097911)
Alexander T. Pila (Texas Bar No. 24110223)
MCDERMOTT, WILL & EMERY LLP
303 Colorado Street, Suite 2200
Austin, Texas 78701-4078
Telephone: (512) 726-2600
Fax: (512) 532-0002
shash@mwe.com
sschickel@mwe.com
apiala@mwe.com

Elizabeth Durham Flannery
Texas Bar No. 24045815
Michael A. Hawes (pro hac vice)
Texas Bar No. 24010761
BAKER BOTTS L.L.P.
910 Louisiana Street
Houston, Texas 77002-4995
Telephone: (713) 229-1234
Facsimile: (713) 229-1522
Liz.flannery@bakerbotts.com
michael.hawes@bakerbotts.com

Michael J. Summersgill (pro hac vice)
michael.summersgill@wilmerhale.com
WILMER CUTLER PICKERING
HALE AND DORR LLP
60 State Street
Boston, Massachusetts 02109
Tel: (617) 526-6000
Fax: (617) 526-5000

Amanda L. Major (pro hac vice)
amanda.major@wilmerhale.com
WILMER CUTLER PICKERING
HALE AND DORR LLP
2100 Pennsylvania Avenue NW
Washington, DC 20037
Tel: (202) 663-6000
Fax: (202) 663-6363

ATTORNEYS FOR NATERA, INC.
AND NSTX, INC.

Respectfully submitted,

/s/ Kerri-Ann Limbeek

Deron R. Dacus
State Bar No. 00790553
THE DACUS FIRM, P.C.
821 ESE Loop 323, Suite 430
Tyler, TX 75701
Phone: (903) 705-1117
Fax: (903) 581-2543
ddacus@dacusfirm.com

John M. Desmarais (*pro hac vice*)
Kerri-Ann Limbeek (*pro hac vice*)
Brian D. Matty (*pro hac vice*)
Benjamin N. Luehrs (State Bar No. 440317)
Kyle G. Petrie (*pro hac vice*)
Joze Welsh (*pro hac vice*)
Jun H. Tong (*pro hac vice*)
Deborah J. Mariottini (*pro hac vice*)
DESMARAIS LLP
230 Park Avenue
New York, NY 10169
Telephone: 212-351-3400
Facsimile: 212-351-3401
jdesmarais@desmaraisllp.com
klimbeek@desmaraisllp.com
bmatty@desmaraisllp.com
bluehrs@desmaraisllp.com
kpetrie@desmaraisllp.com
jwelsh@desmaraisllp.com
jtong@desmaraisllp.com
dmariottini@desmaraisllp.com

Attorneys for Plaintiff Ravgen, Inc.

CERTIFICATE OF SERVICE

The undersigned hereby certifies that all counsel of record who are deemed to have consented to electronic service were served with a copy of the foregoing via the Court's ECF/CM system on May 15, 2023.

/s/ Kerri-Ann Limbeek

Kerri-Ann Limbeek